

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

DOUGLAS JOHNSON,	)	
	)	
Plaintiff,	)	22-cv-3718
v.	)	
	)	
COOK COUNTY SHERIFF THOMAS	)	Hon. Robert W. Gettleman
DART, in his official capacity,	)	Hon. Mag. Heather K. McShain
ANTWAUN BACON, a CCDOC officer, and	)	
COOK COUNTY, a municipal corporation,	)	
	)	
Defendants.	)	

**(AGREED) MOTION FOR EXTENSION OF  
TIME TO COMPLETE FACT DISCOVERY**

The Plaintiff, DOUGLAS JOHNSON, by and through his attorneys of Dvorak Law Offices, LLC hereby respectfully requests that fact discovery be extended by an additional 30 days, from March 29, 2024, up to and including April 29, 2024. In support of his motion, the Plaintiff states the following:

1. The parties have exchanged written discovery.
2. The Plaintiff's deposition was taken on February 6, 2024.
3. Defendant Bacon's deposition was taken on February 14, 2024.
4. New counsel for the Defendant Sheriff filed an appearance on February 16, 2024, and required some time to familiarize himself with the case.
5. Treating physician Dr. Patrick Ennis's deposition was taken on March 7, 2024.
6. Sheriff's employees Orr and Purcell are set to be deposed on March 26 and March 28, 2024, respectively.
7. On March 18, 2024, the Defendant Sheriff raised an objection to the Plaintiff's 30(b)(6) notice dated January 12, 2024, stating a position that

the rider was too broad. The Plaintiff proposed alternative language on March 19, 2024. The parties have collaborated amicably in an effort to narrow the rider such that the appropriate witness can be identified and the scope of questioning can be understood in accordance with the Rule. Defense counsel, who began working on the case after the 30(b)(6) notice had been received, is conferring with his client regarding the suitability of the proposed language.

8. Determinations as to the appropriate 30(b)(6) witness have been unexpectedly delayed by the fact that the representative for Defendant's client has been on trial, in Federal Court, since March 18, 2024. As of March 25, 2024, that trial is still ongoing. Counsel for the Defendant has been able to maintain communication with his client, but the ability to discuss this matter completely has been impacted.

Wherefore, in light of Defense counsel being new to the case, and in light of substantial progress being made on oral discovery, the Plaintiff asks that fact discovery be extended to April 29, 2024. Counsel for the Defendants agree with this motion.

Date: March 25, 2024

*Counsel for the Plaintiff*

Respectfully Submitted,  
/s/ Adrian Bleifuss Prados

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on March 25, 2024, he caused the attached motion to be served upon counsel of record via the Court's electronic filing system.

Respectfully Submitted,  
/s/ Adrian Bleifuss Prados

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